

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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April 3, 2023

**BY ECF**

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: **United States v. Luis Trujillo**  
**14 CR 652 (PGG)**

**MEMO ENDORSED**

*The application is granted.*

**SO ORDERED:**

*Paul G. Gardephe*  
**Paul G. Gardephe, U.S.D.J.**

Dated: *April 28, 2023*

Dear Judge Gardephe:

I write to request early termination of Mr. Trujillo's term of supervised release. Mr. Trujillo has served just over two years of his three-year term of supervision. Since his release from custody, Mr. Trujillo has been steadily employed full-time, continues to live with his wife in a home they own, has become a grandfather for the first time, and has complied with all conditions of his supervision. He seeks early termination of his supervised release at this time so that he may travel internationally with his wife to Greece.

18 U.S.C. §3583(e) gives the Court authority to terminate supervision at any time after the expiration of one year, if such action is "warranted by the conduct of the defendant released and the interests of justice." In this case, as set forth more fully below, early termination is warranted here by Mr. Trujillo's conduct and the interests of justice. Mr. Trujillo has been law-abiding and under either state or federal court supervision for the past two decades.

**Procedural History**

As the Court no doubt recalls, Mr. Trujillo pleaded guilty in 2016 to conspiring to distribute and possess cocaine for offense conduct that took place in 2002. The Court sentenced Mr. Trujillo to a term of five years of imprisonment to be followed by three years of supervised release, balancing the seriousness with the offense, with the length of time that had passed since the offense, Mr. Trujillo's